

Michele R. Stafford, Esq. (SBN 172509)
 Adrian L. Canzoneri, Esq. (SBN 265168)
 SALTZMAN & JOHNSON LAW CORPORATION
 44 Montgomery Street, Suite 2110
 San Francisco, CA 94104
 (415) 882-7900
 (415) 882-9287 – Facsimile
mstafford@sjlawcorp.com
acanzoneri@sjlawcorp.com

Attorneys for Plaintiffs

Jeffrey S. Kaufman, Esq. (SBN 122569)
 Susan E. Bishop, Esq. (SBN 187253)
 BERLINER COHEN, LLP
 Ten Almaden Blvd., 11th Floor
 San Jose, CA 95113
 (408) 286-5800
 (408) 998-5388 – Facsimile
jsk@berliner.com
susan.bishop@berliner.com

Attorneys for Defendants

UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA

RUSSELL E. BURNS, et al.,

Plaintiffs,

v.

G.R. CLARK, INC., a California corporation;
 GORDON RAYMOND CLARK, an
 Individual; and DENNIS GORDON CLARK,
 an Individual,

Defendants.

Case No.: 3:15-cv-00385-VC

**JOINT STIPULATION TO CONTINUE
 CASE MANAGEMENT CONFERENCE
 AND TO SET MEDIATION DEADLINE;
~~PROPOSED~~ ORDER THEREON**

Date: June 16, 2015
 Time: 10:00 a.m.
 Dept.: Courtroom 4, 17th Floor
 450 Golden Gate Ave.
 San Francisco, CA
 Judge: Honorable Vince Chhabria

Plaintiffs and Defendants, by and through their respective counsel of record, hereby respectfully request that the Case Management Conference, currently scheduled for June 16, 2015, in the above-captioned Court, be continued for approximately ninety (90) days, or as soon thereafter as may be convenient for the Court. GOOD CAUSE exists for the requested continuance as follows:

1 1. As the Court's records will reflect, this action was filed by Plaintiffs on January 27,
2 2015 [Dkt. No. 1] to compel Defendants' compliance with its obligations to pay monthly
3 employee contributions to Plaintiffs, along with payment of amounts found due in an audit
4 inspection of Defendants' payroll records, pursuant to Defendants' Collective Bargaining
5 Agreement.

6 2. Defendants filed an Answer to the Complaint on February 25, 2015 [Dkt. No. 14].

7 3. On May 15, 2015, Defendants served their first set of Requests for Production of
8 Documents (the "Requests") on Plaintiffs. Plaintiffs are currently in the process of gathering any
9 documents responsive to Defendants' Requests, and counsel for the parties have agreed on a
10 production date of no later than June 19, 2015.

11 4. In addition, on June 3, 2015, counsel for the parties participated in an ADR Phone
12 Conference with Howard Herman, Director of the Court's ADR Program. During the
13 aforementioned ADR Conference, counsel for the parties agreed to mediate this matter by
14 **September 1, 2015**. This allows Defendants ample time to receive and review the documents
15 produced by Plaintiffs in response to Defendants' Requests, and allows the parties to further their
16 discussions towards resolution of the matter outside of litigation.

17 5. Thus, the parties jointly request a continuance of the Case Management Conference
18 so as to allow the parties to facilitate the production of documents, and to further facilitate
19 settlement of this matter, either informally or through mediation by the September 1, 2015
20 deadline. Both parties desire to resolve this matter without the need for further and unnecessary
21 litigation.

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

SO STIPULATED.

**SALTZMAN & JOHNSON
LAW CORPORATION**

BERLINER COHEN

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE

1 6. There are no issues that need to be addressed by the parties at the currently
 2 scheduled Case Management Conference. In the interest of conserving costs, as well as the
 3 Court's time and resources, Plaintiffs and Defendants jointly and respectfully request that the Case
 4 Management Conference, currently scheduled for June 16, 2015, be continued for approximately
 5 ninety (90) days, to allow sufficient time for the parties to continue their attempts to resolve this
 6 matter outside of litigation.

7
 8 **SO STIPULATED.**

9 Dated: June 3, 2015

SALTZMAN & JOHNSON
 LAW CORPORATION

11 By: 

Adrian L. Canzoneri
 Attorney for Plaintiffs

13
 14 Dated: June 3, 2015

BERLINER COHEN, LLP

15 By: 

Susan E. Bishop,
 Attorney for Defendants

16
 17
 18 **IT IS SO ORDERED.**

19 Based on the foregoing, and GOOD CAUSE APPEARING, the currently set Initial Case
 20 Management Conference is hereby continued to 9/29/2015, at 10:00 AM. All related
 21 deadlines are extended accordingly.

22 Date: June 5, 2015


 UNITED STATES DISTRICT JUDGE

23
 24
 25
 26
 27
 28
 -3-
 JOINT STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE; [PROPOSED] ORDER
 CASE NO.: C15-00385 VC